

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

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This document relates to: *Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*, No. 15-cv-9903 (GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 53, as permitted and approved by the Court's Order of October 28, 2019, ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the new Plaintiff's date of death (if deceased), the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

No.	New Plaintiff's Name	Date of Death	Plaintiff's State of Residency at Filing	Plaintiff's Citizenship - Nationality on 9/11/01	Decedent's Name	New Plaintiff's Relationship to Decedent	Paragraph of Complaint Discussing Decedent
1	Favuzza Bittel, Laura Denise		NY	U.S.	Favuzza, Bernard	Child	ECF#53 ¶ 2913
2	Clendenin, Jr., Brian Thomas		CT	U.S.	DOE AP86	Step-Sibling	ECF#53 ¶ 206
3	Gadiel, Janice Warner		CT	U.S.	DOE AP86	Step-Parent	ECF#53 ¶ 206
4	Pastor, Ashley Elizabeth		CT	U.S.	Gilligan, Ronald L.	Child	ECF#53 ¶ 2059
5	Wright, Lee A.		MD	U.S.	Glascoe, Keith Alexander	Sibling	ECF#53 ¶ 1221
6	Glick, Jeremy Matthew		NY	U.S.	Glick, Barry H.	Child	ECF#53 ¶ 3204
7	Neufeld, Jean Faith		NJ	U.S.	Glick, Barry H.	Child	ECF#53 ¶ 3204
8	Gray, Doreen Julia		FL	U.S.	DOE AP102	Step-Parent	ECF#53 ¶ 929
9	Grimner, David Patrick		NY	U.S.	Grimner, David Joseph	Child	ECF#53 ¶ 1024
10	Jacobson, Miriam Rose		CA	U.S.	Jacobson, Steven A.	Child	ECF#53 ¶ 3439
11	Jacobson, Rachel Bess		CA	U.S.	Jacobson, Steven A.	Child	ECF#53 ¶ 3439
12	Hagan, James T.		NY	U.S.	Josiah, Jane Eileen	Sibling	ECF#53 ¶ 45

13	Keating, Patricia Ann		CA	U.S.	Keating, Barbara A.	Child	ECF#53 ¶ 3125
14	Boodram, Kanhai		NY	Guyana	Khan, Sarah	Sibling	ECF#53 ¶ 119
15	Budram, Angad		NY	Guyana	Khan, Sarah	Sibling	ECF#53 ¶ 119
16	Persaud, Surujpattie		NY	Guyana	Khan, Sarah	Sibling	ECF#53 ¶ 119
17	Ramsaran, Sybil		NY	U.S.	Khan, Sarah	Parent	ECF#53 ¶ 119
18	Takoar, Dhanpaul Budram		NY	Guyana	Khan, Sarah	Sibling	ECF#53 ¶ 119
19	Talarico, Charlene		NJ	U.S.	Laszczynski, Paul	Fiance	ECF#53 ¶ 2076
20	Glatt, Vera		NJ	U.S.	DOE AP93	Sibling	ECF#53 ¶ 735
21	Lichtschein, Margit		NJ	U.S.	DOE AP93	Parent	ECF#53 ¶ 735
22	Lynch, James		NJ	U.S.	DOE AP141	Child	ECF#53 ¶ 1047
23	Lynch, Jonathan		FL	U.S.	DOE AP141	Child	ECF#53 ¶ 1047
24	Lynch, Mark		NJ	U.S.	DOE AP141	Child	ECF#53 ¶ 1047
25	Lynch, Patrick		NJ	U.S.	DOE AP141	Child	ECF#53 ¶ 1047

Dated: June 4, 2020

Respectfully submitted,

/s/ John Eubanks

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